

1 (Whereupon, a Bankruptcy Court Document was
2 then received and marked as Exhibit D-13, for
3 identification.)
4

5 BY MR. OPPENHEIMER:

6 Q. This is D-13. You filed a petition for a
7 voluntary bankruptcy on March 3rd, 2009, right?
8 Do you recall filing for bankruptcy in March of
9 2009.

10 A. Yes.

11 Q. Okay. And --

12 MS. GRECO: Is there a signature on this somewhere or
13 is this -- oh, there. It's at the bottom. I see
14 the bottom. I did not see that before.

15 MR. OPPENHEIMER: Okay.

16 MS. GRECO: For the record, the bottom shows a filing
17 with a case number. Go ahead.

18 BY MR. OPPENHEIMER:

19 Q. Who was your -- did you retain counsel to file a
20 bankruptcy for you?

21 A. Yes, I did.

22 Q. And that was David Butterini?

23 A. Yup.

1 Q. Okay. And were you honest and truthful when you
2 spoke to Mr. Butterini about your assets and
3 liabilities?

4 A. Yes.

5 Q. Okay. Did you ever disclose to Mr. Butterini --
6 MS. GRECO: Any conversation you had with your
7 attorney is attorney/client privilege.

8 BY MR. OPPENHEIMER:

9 Q. Did you ever ask -- well, tell me --

10 MS. GRECO: No conversation with her attorney will
11 she be permitted to answer.

12 MR. OPPENHEIMER: That's fine.

13 MS. GRECO: If you have something other than a
14 conversation with your attorney you can.

15 BY MR. OPPENHEIMER:

16 Q. Where in your petition did you disclose that you
17 had a claim against Black Angus or Keegan Roberts
18 or the Seiberts?

19 MS. GRECO: She has to read the whole thing.

20 BY MR. OPPENHEIMER:

21 Q. Did you disclose that to the trustee in your
22 bankruptcy?

23 MS. GRECO: Do you know what a trustee is? Strike

1 that. Objection to the form of the question.

2 BY MR. OPPENHEIMER:

3 Q. Do you recall --

4 MS. GRECO: You have a question pending and she's
5 looking.

6 MR. OPPENHEIMER: I can do what I want with my
7 question.

8 MS. GRECO: Are you withdrawing your question?

9 MR. OPPENHEIMER: I'll let you know if I do.

10 MS. GRECO: Do you want her to keep looking or stop?

11 MR. OPPENHEIMER: I want her to keep looking.

12 MS. GRECO: Keep reading.

13 BY MR. OPPENHEIMER:

14 Q. Turn to page --

15 MS. GRECO: She has a right to read a legal document.
16 You asked her specifically if there is something
17 in here.

18 MR. OPPENHEIMER: I'm directing her attention to a
19 particular page to help the witness -- I'm
20 withdrawing the question then, counsel. I'll
21 play a trick out of your playbook.

22 MS. GRECO: That's fine. It's not a trick. You have
23 a right to withdraw a question if you want to.

1 BY MR. OPPENHEIMER:

2 Q. Okay. Page ten of forty-one, are you there? On
3 the bottom there's a number twenty-one. It talks
4 about contingent unliquidated claims of every
5 nature.

6 MS. GRECO: Forty-one? Objection.

7 MR. OPPENHEIMER: Twenty-one, I said.

8 MS. GRECO: Read it. He's asking you to read that
9 language.

10 MR. OPPENHEIMER: Right.

11 MS. GRECO: I don't even know what that is.

12 THE WITNESS: I read it.

13 BY MR. OPPENHEIMER:

14 Q. Did you ever disclose to the Court at any filing
15 that you had a claim against Black Angus or the
16 Seiberts or Keegan Roberts?

17 MS. GRECO: Objection to the form of the question.
18 If you understand it.

19 THE WITNESS: I don't understand what you mean.

20 BY MR. OPPENHEIMER:

21 Q. Okay. You filed this in 2009, right?

22 A. Yes.

23 Q. And you've been testifying all day about, you

1 know, the things that were happening at Black
2 Angus between 2005 and 2009. Right?

3 A. Yes.

4 Q. And your counsel wouldn't let you talk about your
5 conversations with your bankruptcy lawyer about
6 whether you even disclosed that to him so I'm
7 asking you whether you disclosed any of the
8 claims that you think you have against Black
9 Angus or Keegan Roberts or the Seiberts to the
10 bankruptcy court?

11 MS. GRECO: Objection to form of the question. The
12 word claim has a legal definition. This is March
13 3rd of 2009. There was no legal claim filed.
14 Counsel knows it and so do I, so --

15 MR. OPPENHEIMER: We've been talking about her claims
16 all day.

17 MS. GRECO: Claim. She's a layperson. If you want
18 to define or that she filed something that --

19 MR. OPPENHEIMER: I don't have to define it.

20 MS. GRECO: I know you don't. Objection to the form
21 of the question.

22 BY MR. OPPENHEIMER:

23 Q. Did you bring to the attention of the bankruptcy

1 court the fact that you thought that you were the
2 victim of discrimination at Black Angus Meats?

3 MS. GRECO: Objection to the form of the question.

4 BY MR. OPPENHEIMER:

5 Q. Did you do that? Did you bring it to the
6 attention of the bankruptcy court?

7 MS. GRECO: Objection to the form of the question.

8 It's a legal question. Does she even know what
9 attention to the court -- of the bankruptcy court
10 is?

11 MR. OPPENHEIMER: I didn't ask her what it is. I
12 asked if she did something. Counsel, you made
13 your objection. Let your witness answer.

14 MS. GRECO: You're done with your time. Last
15 question.

16 MR. OPPENHEIMER: No, I'm not done with my time.
17 You've been objecting just because you want to
18 prevent this witness from answering.

19 MS. GRECO: No. This is a document. You're asking
20 her a legal question.

21 MR. OPPENHEIMER: No, I asked her --

22 MS. GRECO: You wouldn't define it. We're done when
23 we're done. When the time is done, we're done.

1 Which means we have -- I have one minute. What
2 do you have?

3 MR. OPPENHEIMER: Did you ever bring to the
4 bankruptcy court -- go ahead, counsel, and we'll
5 be back here, because of your conduct and
6 delaying this witness from answering these
7 questions.

8 MS. GRECO: Please. I have an objection and I will
9 put my objections on the record.

10 MR. OPPENHEIMER: Can I get an answer to my question?

11 MS. GRECO: She doesn't -- look.

12 THE WITNESS: I don't understand.

13 BY MR. OPPENHEIMER:

14 Q. Did you ever bring to the attention of the
15 bankruptcy court the fact that you believed you
16 had been a victim of discrimination at Black
17 Angus Meats?

18 MS. GRECO: Objection to the form of the question.
19 She already told you she doesn't understand it.

20 MR. OPPENHEIMER: You're answering, counsel. I'd
21 like you to shut your mouth.

22 MS. GRECO: You keep saying the same thing over --
23 she said she didn't understand it. Why don't you

1 rephrase it?

2 BY MR. OPPENHEIMER:

3 Q. Did you ever bring to the bankruptcy court's

4 attention any of your allegations in this case

5 about pay inequity?

6 A. No.

7 Q. Did you ever bring --

8 MS. GRECO: No. We're done.

9 MR. OPPENHEIMER: No, you're not going to do that.

10 MS. GRECO: That's the time. We're done.

11 MR. OPPENHEIMER: Did you --

12 MS. GRECO: We're done. Time is up. We're done.

13 MR. OPPENHEIMER: If you want -- you continue taking

14 down my questions so when the Order comes from

15 the Court she will answer these questions.

16 MS. GRECO: You have had your client Robert

17 Seibert --

18 MR. OPPENHEIMER: If you want to walk out --

19 MS. GRECO: This is the end of the time.

20 MR. OPPENHEIMER: No.

21 MS. GRECO: Well, tell me on the record how many

22 minutes you think you have left, because you

23 timed it.

1 MR. OPPENHEIMER: Based on all of your objections and
2 conduct now another five minutes.

3 MS. GRECO: We're done. Let's go.

4 MR. OPPENHEIMER: Well, you can leave but the
5 deposition's not over.

6 MS. GRECO: You think you have five more minutes and
7 I'm telling you it's done. You can't go on. If
8 you pose the question --

9 MR. OPPENHEIMER: If you want to leave go.

10 BY MR. OPPENHEIMER:

11 Q. The next question, did you ever disclose to the
12 bankruptcy court any of the facts on which you
13 rely in this case --

14 MS. GRECO: We're done.

15 BY MR. OPPENHEIMER:

16 Q. -- with respect to race discrimination?

17 MS. GRECO: We'd like to put on the record we are
18 leaving. It's a seven-hour deposition. It has
19 been timed like all our other depositions have
20 been timed, and we made proper objections. He
21 rephrased it, she answered.

22 BY MR. OPPENHEIMER:

23 Q. Did you ever bring to the bankruptcy court's

1 attention any of the facts that you rely on in
2 this case with respect to your claims of hostile
3 work environment? Did you ever bring to the
4 bankruptcy court's attention any of the facts on
5 which you rely in this case for your claims
6 concerning gender discrimination?

7 MR. OPPENHEIMER: Please let the record reflect the
8 witness has been escorted out of the room by her
9 counsel.

10 MS. GRECO: The witness has left.

11 MR. OPPENHEIMER: You just pushed her out the door,
12 counsel. Off the record.

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